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Attorneys for Plaintiff X Corp.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

X CORP.,

Plaintiff,

v.

ROBERT A. BONTA, Attorney
General of California, in his
official capacity,

Defendant.

No. 2:23-cv-01939-WBS-AC

**STIPULATION TO CONTINUE THE
STATUS CONFERENCE AND FOR AN
EXTENSION OF TIME TO FILE A
JOINT STATUS REPORT**

Judge: Hon. William B. Shubb
Trial Date: None set
Action Filed: September 8, 2023

1 In accordance with Local Rule 144, Plaintiff X Corp. and
2 Defendant Attorney General Robert Bonta, in his official capacity,
3 (collectively referred to herein as "Parties") hereby stipulate,
4 subject to the Court's approval, to extend the schedule for the
5 Status (Pretrial Scheduling) Conference and Joint Status Report
6 (from that set forth under ECF No. 3) as follows:

7 WHEREAS, on September 8, 2023, the Court issued an Order
8 Regarding Status (Pretrial Scheduling) Conference, which set a
9 Status Conference for January 16, 2024 and requires the Parties to
10 file a Joint Status Report on or before January 2, 2024.

11 WHEREAS, X Corp. filed a motion for a preliminary injunction
12 on October 6, 2023, that has been fully briefed and argued, and
13 remains pending before this Court.

14 WHEREAS, on September 28, 2023, this Court extended
15 Defendant's time to respond to the Complaint as follows:

16 (a) if any party appeals this Court's order on X Corp.'s
17 motion for preliminary injunction, 21 days after the Ninth Circuit
18 issues its mandate in the appeal;

19 (b) if no party appeals, 21 days after the expiration of the
20 time period designated to file such an appeal. See Dkt. No. 15.

21 WHEREAS, the Parties respectfully submit that it makes sense
22 to obtain a ruling on Plaintiff's motion for preliminary injunction
23 prior to completing the Joint Status Report and Status Conference,
24 as the Court's ruling may affect several matters that are the
25 subject of such report and may result in an appeal that would
26 impact the timing of discovery deadlines and pre-trial and trial
27 proceedings in this action.

28 WHEREFORE, the Parties stipulate, and respectfully request,
STIPULATION TO CONTINUE THE STATUS CONFERENCE AND FOR AN
EXTENSION OF TIME TO FILE A
JOINT STATUS REPORT

1 that the Status Conference be continued to a later date of the
2 Court's choosing, at least 30 days after the date Court anticipates
3 issuing its ruling on the motion for preliminary injunction.
4 Furthermore, the Parties stipulate, and respectfully request, that
5 the deadline to file the Joint Status Report be extended to fourteen
6 calendar days prior to the continued Status Conference.

7
8 DATED: December 26, 2023
9

10 Respectfully submitted,

11 /s/ Joel Kurtzberg

12 CAHILL GORDON & REINDEL LLP

13 JOEL KURTZBERG (admitted *pro hac vice*)

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/s/ Gabrielle D. Boutin
Gabrielle D. Boutin
Deputy Attorney General

*Attorneys for Defendant
Attorney General Robert Bonta,
in his official capacity*